

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

H. CRISTINA CHEN-OSTER;  
SHANNA ORLICH; ALLISON  
GAMBA; and MARY DE LUIS,

Plaintiffs,

v.

GOLDMAN, SACHS & CO. and THE  
GOLDMAN SACHS GROUP, INC.,

Defendants.

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10 Civ. 6950 (AT) (RWL)

**STIPULATION AND [PROPOSED] ORDER REGARDING DEPOSITIONS**

WHEREAS, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs and Defendants (collectively, the "Parties") in the above-captioned action (the "Action"), by their counsel, have conferred;

NOW THEREFORE, the Parties hereby stipulate and agree, by their counsel and subject to the approval of the Court, as follows:

1. The Parties shall have the right to depose any witness designated by the opposing Party to testify at trial who has not been previously deposed in this Action. Any such depositions shall occur within a reasonable amount of time prior to the start of trial and no later than three weeks prior to the start of trial, or as otherwise ordered by the Court.

DATED: New York, New York  
September 24, 2019

Respectfully submitted,

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IT IS SO ORDERED.

DATED: 9/24/19

  
THE HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE